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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FRANKIE ALLEN PERAZA,

Defendant.

CASE NO.: 2:14-cr-00229-APG-NJK

**STIPULATION TO EXTEND
BRIEFING SCHEDULE
(Amended First Request)**

IT IS HEREBY STIPULATED AND AGREED by Defendant Frankie Allen Peraza, by and through his attorney, Thomas A. Ericsson, Esq., and Daniel G. Bogden, United States Attorney, and Cristina D. Silva and Elham Roohani, Assistant United States Attorneys, counsel for the United States of America, that the briefing schedule on the motion to suppress be extended as follows¹:

1. Defendant's Supplemental Brief shall be due on July 8, 2016.
2. Government's Response to Supplemental Brief shall be due on July 15, 2016.

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¹ The Parties will be filing a Stipulation to Continue Calendar Call and Trial Date forthwith in this matter.

3. Defendant's Reply to Government's Response shall be due on July 20, 2016.

4. This request and stipulation is made due to Defense Counsel's miscalculation of the time required for him to: 1) finalize trial preparation for a State Court murder trial² scheduled to begin at 1:30 pm on July 11, 2016; 2) finalize a Nevada Supreme Court opening brief due on July 6, 2016, in Quavas Williams v. State of Nevada; and 3) listen to the recording of the first day of the Evidentiary Hearing in the instant matter, and conduct legal research and draft the supplemental brief in light of the evidence presented in the Evidentiary Hearing.

5. This request and stipulation is made in good faith and not made for the purpose of undue delay.

DATED: July 7, 2016

DANIEL G. BOGDEN,
United States Attorney

/s/ Thomas A. Ericsson
Thomas A. Ericsson, Esq.
Oronoz, Ericsson & Gaffney, LLC
1050 Indigo Drive, Suite 120
Las Vegas, Nevada, 89145
Attorney for Defendant

/s/ Elham Roohani
ELHAM ROOHANI, Esq.
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada, 89101
Attorney for the United States of America

ORDER

BASED ON THE FOREGOING STIPULATION OF THE PARTIES IT IS HEREBY ORDERED that the briefing schedule on the motion to suppress be extended as follows:

1. Defendant's Supplemental Brief shall be due on July 8, 2016.

2. Government's Response to Supplemental Brief shall be due on July 15, 2016.

² State of Nevada v. Russell Hultgren, C-10-268763-1.

3. Defendant's Reply to Government's Response shall be due on July 20, 2016.

DATED AND DONE this 8th day of July, 2016.



UNITED STATES MAGISTRATE JUDGE